

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF ILLINOIS
EAST ST. LOUIS DIVISION**

CATHERINE ALEXANDER,

Plaintiff,

-vs-

TAKE-TWO INTERACTIVE SOFTWARE, INC.,
2K GAMES, INC.; 2K SPORTS, INC.; WORLD
WRESTLING ENTERTAINMENT, INC.;
VISUAL CONCEPTS ENTERTAINMENT;
YUKE'S CO., LTD.; AND YUKE'S LA, INC.,

Defendants.

CASE NO. 3:18-CV-966-SMY

JOINT STIPULATION RELATING TO TRIAL MANAGEMENT PROCEDURES

Plaintiff Catherine Alexander ("Plaintiff"); and Defendants Take-Two Interactive Software, Inc., 2K Games, Inc., 2K Sports, Inc., and Visual Concepts Entertainment (collectively, "Take-Two"); and Defendant World Wrestling Entertainment, Inc. ("WWE") (collectively with Take-Two, "Defendants"), by and through their attorneys, hereby jointly stipulate as follows with regard to the following trial management procedures:

1. **Opening Statements.** The parties will exchange lists of trial exhibits and copies of demonstratives that they intend to show to the jury during opening statements by 7:00 p.m. the night before opening statements are given. The parties will meet and confer at 9:00 p.m. the night before opening statements are to be given to try to resolve any objections. The parties will raise any unresolved objections to the Court prior to 9:00 a.m. the following day or in any other manner directed by the Court.

2. **Live Witness Identification.** The parties will identify witnesses to be called live, in the order of call, by 7:00 p.m. two nights before the intended testimony is to be given. For

example, if a witness will be called Monday, that witness must be disclosed by 7:00 p.m.

Saturday. Each party will also disclose when it anticipates resting its case-in-chief, by 1:00 p.m. one day before.

3. **Demonstratives.** The parties will exchange copies of demonstratives that they intend to use at trial during direct examination—but not cross examination, redirect examination, or examination of an adverse witness—by 7:00 p.m. the night before their intended use. The parties will meet-and-confer regarding objections to demonstratives at 9:00 p.m. the night before their intended use. The parties will raise any unresolved objections to the Court prior to 9:00 a.m. the following day or in any other manner directed by the Court. Demonstratives created in the courtroom (e.g., drawings on whiteboards, lists written on easels, etc.) do not need to be disclosed. Treatments of exhibits (e.g., enlargements or highlighting) do not need to be disclosed as demonstratives. Demonstratives exchanged will not be used by an opposing party prior to being used by the disclosing party.

IT IS SO STIPULATED.

Dated: September 20, 2022

/s/ Anthony R. Friedman (with consent)

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CERTIFICATE OF SERVICE

I hereby certify that on September 20, 2022, I electronically filed the foregoing **Joint Stipulation Relating to Trial Management Procedures** with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following:

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